

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BOSTON SCIENTIFIC CORPORATION
and BOSTON SCIENTIFIC SCIMED, INC.,

Plaintiffs,

v.

JOHNSON & JOHNSON, INC.,
CORDIS CORPORATION, and WYETH

Defendants.

Civil Action No. 07-333-SLR
Civil Action No. 07-348-SLR
Civil Action No. 07-409-SLR

BOSTON SCIENTIFIC CORPORATION
and BOSTON SCIENTIFIC SCIMED, INC.,

Plaintiffs,

v.

JOHNSON & JOHNSON, INC.,
CORDIS CORPORATION, and WYETH

Defendants.

Civil Action No. 07-765-SLR

NOTICE OF DEPOSITION OF GERARD H. LLANOS

TO:

Steven J. Balick, Esq.
John G. Day, Esq.
Lauren E. Maguire, Esq.
ASHBY & GEDDES
500 Delaware Avenue, 8th Floor
P.O. Box 1150
Wilmington, DE 19899
(302) 654-1888

David T. Pritikin, Esq.
William H. Baumgartner, Jr., Esq.
Russell E. Cass, Esq.
Andrew R. Hein, Esq.
Jon M. Spanbauer, Esq.
SIDLEY AUSTIN LLP
One South Dearborn
Chicago, IL 60603
(312) 853-7000

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30, Plaintiffs Boston Scientific Corp. and Boston Scientific Scimed, Inc. will take the deposition upon oral examination of Gerard H. Llanos.

The deposition will begin on September 10, 2008, at 9:00 a.m. at the law offices of Kenyon & Kenyon LLP, One Broadway, New York, New York, 10004, or at such other place as may be agreed upon by counsel, and will continue from day to day until completed, with such adjournments as to time and place as may be necessary. The deposition will be taken before a Notary Public (or another officer duly authorized to administer oaths) and will be recorded by stenographic, audio and videographic means. You are invited to attend and cross-examine.

YOUNG CONAWAY STARGATT & TAYLOR LLP

/s/ Karen L. Pascale

August 27, 2008

Josy W. Ingersoll (No. 1088) [jingersoll@ycst.com]
Karen L. Pascale (No. 2903) [kpascale@ycst.com]
Karen E. Keller (No. 4489) [kkeller@ycst.com]
Andrew A. Lundgren (No. 4429) [alundgren@ycst.com]
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, Delaware 19801
(302) 571-6600

*Attorneys for Plaintiffs,
Boston Scientific Corporation and
Boston Scientific Scimed, Inc.*

OF COUNSEL:

Richard L. DeLucia
Paul M. Richter
Jeffrey S. Ginsburg
Michael K. Levy
KENYON & KENYON LLP
One Broadway
New York, New York 10004
(212) 425-7200

CERTIFICATE OF SERVICE

I, Karen L. Pascale, Esquire, hereby certify that on August 27, 2008, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Steven J. Balick, Esquire [sbalick@ashby-geddes.com]
John G. Day, Esquire [jday@ashby-geddes.com]
Lauren E. Maguire, Esquire [lmaguire@ashby-geddes.com]
ASHBY & GEDDES
500 Delaware Avenue, 8th Floor
Wilmington, DE 19801

I further certify that on August 27, 2008, I caused a copy of the foregoing document to be served by e-mail on the above-listed counsel and on the following non-registered participants in the manner indicated:

By E-Mail

David T. Pritikin, Esquire [dpritikin@sidley.com]
William H. Baumgartner, Esquire [wbaumgartner@sidley.com]
Paul E. Veith, Esquire [pveith@sidley.com]
Russell E. Cass, Esquire [rcass@sidley.com]
SIDLEY AUSTIN LLP
One South Dearborn
Chicago, IL 60603

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Karen L. Pascale

Josy W. Ingersoll (#1088) [jingersoll@ycst.com]
Karen L. Pascale (#2903) [kpascale@ycst.com]
Karen E. Keller (#4489) [kkeller@ycst.com]
Andrew A. Lundgren (#4429) [alundgren@ycst.com]
The Brandywine Building
1000 West Street, 17th Floor
Wilmington, Delaware 19801
(302) 571-6600
*Attorneys for Plaintiffs, Boston Scientific Corporation
and Boston Scientific Scimed, Inc.*